

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Implementation of the Pay Telephone)	
Reclassification and Compensation)	CC Docket No. 96-128
Provisions of the Telecommunications)	
Act of 1996)	

**COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC. IN
SUPPORT OF SPRINT CORPORATION'S PETITION FOR RECONSIDERATION**

Pursuant to section 1.429(f) of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 1.429(f), Qwest Communications International Inc. ("Qwest") respectfully submits these comments in connection with the petitions for reconsideration of the Commission's *Report and Order*, FCC 03-235 ("the *Order*"), released October 3, 2003 in the above-captioned docket.

Sprint Corporation ("Sprint") has asked the Commission to reconsider its requirement that a Completing Carrier's Chief Financial Officer ("CFO") submit a sworn certification each quarter with the carrier's payment. Sprint proposes that the Commission allow any corporate officer, not just the CFO, to complete the required certification. (Sprint Corporation's Petition for Reconsideration, dated December 8, 2003 ("Sprint Petition").) Qwest supports the Sprint Petition.

As Qwest has stated before in this proceeding, it is one of the largest payphone service providers ("PSP") and interexchange carriers in the country, as well as a facilities-based reseller, a local exchange carrier and a provider of prepaid calling card services. Because Qwest represents all of the divergent factions of the industry that are impacted by the payphone

compensation rules, its goal is to improve the effectiveness of the compensation scheme and avoid simply placing most of the costs and burdens on one segment of the industry.

Qwest proposed -- and is gratified the Commission adopted -- a certification requirement. Qwest believes that the certification with penalties for either failure to certify or false certification will eliminate the financial incentive a reseller may have to misreport call completion numbers to a PSP. Nonetheless, Qwest believes that the corporate officer certifying the call completion numbers need not be the CFO. The deterrent effect of certification will not be diminished if the officer signing the certification has a title other than CFO.

The CFO of a large, diversified corporation has many responsibilities. The purpose behind the quarterly certification will be served to the same degree, and perhaps more efficiently, if another officer, other than the CFO signs the verification. Qwest believes that granting the Sprint Petition will allow the same benefits to the compensation scheme that are present in the *Order*, but will avoid placing undue quarterly burdens on the CFO.

Respectfully submitted,

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February 10, 2004

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC. IN SUPPORT OF SPRINT CORPORATION'S PETITION FOR RECONSIDERATION** to be: 1) filed with the FCC via its Electronic Comment Filing System in CC Docket No. 96-128; 2) served, via email on the FCC's duplicating contractor Qualex International, Inc., at qualex.int@aol.com; and 3) served, via First Class United States mail, postage prepaid, on the parties listed on the attached service list.

Richard Grozier
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February 10, 2004

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